

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**Case No. 05-20874-CR-ALTONAGA**

**UNITED STATES OF AMERICA,**

**vs.**

**GUY PHILIPPE,**

**Defendant.**

\_\_\_\_\_ /

**FACTUAL PROFFER**

The United States of America and GUY PHILIPPE (PHILIPPE) agree that if this matter had proceeded to trial, the government's evidence would have shown, beyond a reasonable doubt, that:

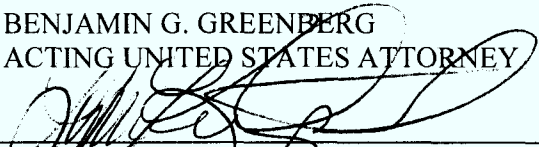
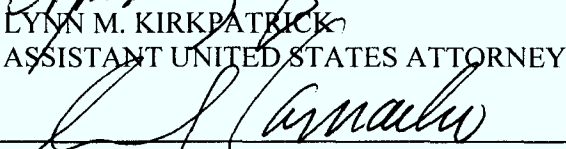

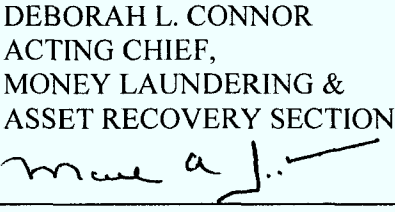


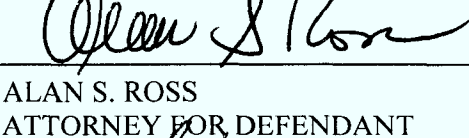

Beginning in the late 1990s, cocaine was brought into Haiti from Colombia and other locations in South America by drug traffickers. After the drugs were unloaded in Haiti, they were then smuggled into Miami, Florida and other locations in the United States by vessels and commercial airlines. PHILIPPE knowingly used his position as a high-ranking Haitian National Police officer to provide protection for these shipments of drugs and drug proceeds into Haiti in exchange for cash payments.

Specifically, beginning in or around June 1999 and continuing until in or around April 2003, PHILIPPE and others were paid in Haiti from the proceeds of the cocaine sales that occurred in Miami, Florida and elsewhere in the United States. Those bulk-cash proceeds would be smuggled from the United States to Haiti, and PHILIPPE would be paid a portion of the proceeds.

PHILIPPE and his wife maintained a joint banking account at First Union National Bank in Miami Florida. Between June 1999 and December 2002, PHILIPPE knowingly wired over \$376,000 in U.S. Dollars derived from the sale of cocaine from Haiti and Ecuador to this First Union National Bank account under the names of other people. PHILIPPE also knowingly arranged for over \$70,000 in U.S. Dollars of drug proceeds to be deposited into the account. Each of these cash deposits was made in amounts less than \$10,000 to avoid the reporting requirements.

From approximately June 1999 to approximately April 2003, PHILIPPE received more than \$1,500,000 and less than \$3,500,000 in bribe payments from drug traffickers, knowing that the payments constituted proceeds of cocaine trafficking. PHILIPPE shared the drug proceeds he collected with Haitian National Police officials and other security personnel to ensure their continued support for future drug shipments arriving in to Haiti; to purchase a residence in Broward County, Florida; and to support himself and his family in the United States.

All in violation of 18 U.S.C. § 1956(h).

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|----------------------|---|
| Date: <u>4/24/17</u> | By: <u></u><br>BENJAMIN G. GREENBERG<br>ACTING UNITED STATES ATTORNEY                               |
| Date: <u>4/24/17</u> | By: <u></u><br>LYNN M. KIRKPATRICK<br>ASSISTANT UNITED STATES ATTORNEY                             |
| Date: <u>4/24/17</u> | By: <u></u><br>ANDY R. CAMACHO<br>ASSISTANT UNITED STATES ATTORNEY                                |
| Date: <u>4/24/17</u> | By: <u></u><br>DEBORAH L. CONNOR<br>ACTING CHIEF,<br>MONEY LAUNDERING &<br>ASSET RECOVERY SECTION |
| Date: <u>4/24/17</u> | By: <u></u><br>MARK A. IRISH<br>SENIOR TRIAL COUNSEL  |
| Date: <u>4/24/17</u> | By: <u></u><br>ZELJKA BOZANIC<br>ATTORNEY FOR DEFENDANT   |
| Date: <u>4/24/17</u> | By: <u></u><br>ALAN S. ROSS<br>ATTORNEY FOR DEFENDANT   |
| Date: <u>4/24/17</u> | By: <u></u><br>GUY PHILIPPE<br>DEFENDANT  |